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August 17, 2021

**Via ECF**

The Honorable Judge Analisa Torres  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **Francisco Ramos-Ramirez, et al v. Alex Auto Parts, Inc. et al**  
**1:20-cv-05079 (AT)**

Dear Judge Torres:

This office represents Plaintiff in the above-referenced matter, and we respectfully submit this letter in response to the Court's August 3, 2021 Order to Show Cause and to request a two-week extension of time for the parties to submit their settlement agreement and motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) ("Settlement Agreement"). We sincerely apologize to the Court for overlooking the prior deadlines, the result of an inadvertence, and for not filing this status report to the Court sooner.

On April 5, 2021, the Court initially ordered that the parties' Settlement Agreement documents in this matter were due to the Court by May 5, 2021 (ECF Dkt. No. 21); and on May 17, 2021, the Court granted the parties' joint motion for an extension of time to file their settlement submissions by May 26, 2021, which deadline Your Honor extended to July 6, 2021 (ECF Dkt. Nos. 23-24).

Our office has been working closely with defense counsel on finalizing the drafting of the terms of the parties' Settlement Agreement and Motion for Court Approval. The parties previously ran into some issues preventing them from finalizing the Settlement Agreement and should have previously advised the Court of these issues. However, the parties now believe that they have worked through issues and respectfully request a two (2) week extension to file the aforementioned settlement documents. If granted, the parties expect at this time to have the finalized Settlement Agreement documents on or before August 31, 2021. Our office will continue to work diligently with defense counsel over the next two weeks and anticipate August 31, 2021 to be enough time to do so.

This is the second request for an extension of time to file the settlement documents and this request will not affect any other scheduled dates or deadlines and we again offer our apologies

to the Court for failing to comply with the prior Orders and will make sure this does not happen again.

We thank Your Honor for her consideration on this matter and we remain available to provide any additional information.

Respectfully submitted,

/s/  
Roman Avshalumov, Esq.

GRANTED. By **August 31, 2021**, Plaintiff shall file the parties' settlement agreement and related documents.

SO ORDERED.

Dated: August 19, 2021  
New York, New York



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ANALISA TORRES  
United States District Judge